


U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CRH/JMH/EHS
F. #2017R00906

271 Cadman Plaza East
Brooklyn, New York 11201

December 3, 2021

By Email, USAFx and FedEx

Lawrence S. Lustberg
Genna A. Conti
Gibbons P.C.
1 Gateway Center
Newark, New Jersey 07102

Brian Neary
Court Plaza South
21 Main Street, Suite 305-A
Hackensack, New Jersey 07601

Re: United States v. Michael McMahon
Criminal Docket No. 21-265 (PKC)

Dear Counsel:

Enclosed please find the following additional materials, which are being produced in accordance with the government's discovery obligations:

Description	Begin Bates	End Bates
Interview of co-conspirator, dated April 12, 2017	MM-004247	MM-004248
Interview of co-conspirator, dated April 12, 2017	MM-004249	MM-004263
Interview of co-conspirator, dated April 12, 2017	MM-004264	MM-004265
Statements made by the defendant on or about October 28, 2020	MM-004266	MM-004270
Recordings of statements made by co-conspirator on or about October 28, 2020	MM-004289	MM-004289

Description	Begin Bates	End Bates
Statements made by co-conspirator on or about October 28, 2020	MM-004271	MM-004280
Statements made by co-conspirator on or about November 18, 2020	MM-004281	MM-004288
Google data and records	MM-004290	MM-004290
Apple iCloud data and records ¹	MM-004291	MM-004291

Due to the volume of data, we will be producing a portion of these materials via hard drive through the mail.

The materials are being provided subject to the protective order agreed to by the parties and entered by the Court on June 18, 2021. See ECF No. 70 (“the Protective Order”). The government considers all of the materials produced today to constitute “sensitive discovery material” as that term is defined in the Protective Order, and has identified such materials accordingly. See Protective Order ¶¶ 7-9. The government reiterates its request for reciprocal discovery from the defendant.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Craig R. Heeren
Craig R. Heeren
J. Matthew Haggans
Ellen H. Sise
Assistant U.S. Attorneys
(718) 254-7000

Enclosures (via USAFx)

cc: Clerk of the Court (PKC) (by ECF) (without enclosures)

¹ Some of this data has been previously produced to you, and is being reproduced for your convenience.